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Attorney for Plaintiffs
IRMA RAMIREZ; and
DAREN HEATHERLY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IRMA RAMIREZ; and DAREN
HEATHERLY,

Plaintiffs,

v.

QOIO, *et al.*,

Defendants.

CASE NO. 3:14-cv-03243-LB

**STIPULATION OF DISMISSAL AND
~~PROPOSED~~ ORDER THEREON**

The Parties, by and through their respective counsel, stipulate to dismissal of this action in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(2).

IT IS HEREBY STIPULATED by and between parties to this action through their designated counsel that the above-captioned action become and hereby is dismissed with prejudice and each side is to bear its own costs and attorneys' fees.

The parties further consent to and request that the Court retain jurisdiction over enforcement of the Agreement. *See Kokonen v. Guardian Life Ins. Co.*, 511 U.S. 375 (1994) (empowering the district courts to retain jurisdiction over enforcement of settlement agreements).

STIPULATION OF DISMISSAL AND ~~PROPOSED~~ ORDER

1 This stipulation may be executed in counterparts, all of which together shall
2 constitute one original document.

3 Respectfully Submitted,

4 Dated: March 17, 2016

THOMAS E. FRANKOVICH, APLC
A PROFESSIONAL LAW CORPORATION

6 By: /s/ Thomas E. Frankovich

7 Thomas E. Frankovich

8 Attorney for Plaintiff

9 Dated: March 17, 2016

MURCHISON & CUMMING, LLP

10 By: /s/ Melissa W. Eisenberg

11 Melissa W. Eisenberg

12 Attorney for Defendant Bruno Guarini dba Qoio

13 Dated: March 17, 2016

ATTORNEY AT LAW

14 By: /s/ Marc Libarle

15 Marc Libarle

16 Attorney for Defendant 501 Columbus LLC

17 **ORDER**

18 IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to
19 Fed.R.Civ.P.41(a)(2) and each side is to bear its own costs and attorneys' fees. IT IS
20 FURTHER ORDERED that the Court shall retain jurisdiction for the purpose of enforcing
21 the parties' Settlement Agreement and General Release should such enforcement be
22 necessary.
23

24 Dated: March 21, 2016



25
26 Hon. Laurel Beeler
UNITED STATES MAGISTRATE JUDGE